## Law Offices of Ezra Spilke

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April 20, 2022

**By ECF** 

The Honorable Edgardo Ramos United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

**MEMO ENDORSED** 

Re: United States v. Issak Almaleh et al., No. 17 Cr. 25 (ER)

Dear Judge Ramos:

I write on behalf of both defendants to respectfully request an order varying from the standardized schedule for the preparation of Pre-Sentence Investigation Reports by forty-five days. *In re Standardizing Dates for the Preparation of Pre-Sentence Investigation Reports*, 14-mc-00141-P1 (S.D.N.Y. May 30, 2014). I am currently on trial before the Honorable Pamela K. Chen in *United States v. Tawanna Hilliard*, No. 19 Cr. 358 (E.D.N.Y.) and will not be able to participate in a presentence interview until after trial. Additionally, counsel need more of an opportunity to explore our clients' complaints (*e.g.*, ECF No. 497) and determine what relief, if any, they are seeking. The current first disclosure deadline is May 11, 2022. Should the Court grant this request, the new first disclosure deadline would be June 27, 2022. Neither the government nor the Probation Department objects to this application.

Respectfully submitted,

/s Ezra Spilke
Law Offices of Ezra Spilke, PLLC
Counsel for Issak Almaleh

cc: All counsel of record, by ECF

U.S. Probation Officer Specialist Paul Hay, by email

The deadlines associated with the preparation of the pre-sentencing report are extended by 45 days. SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 4/21/2022 New York, New York